



Allband Communications Cooperative
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June 14, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Allband Communications Cooperative (WC Docket No. 05-174)


Dear Ms. Dortch:

On April 7, 2005, Allband Communications Cooperative ("Allband") requested waiver of Sections 69.2(hh) and 69.601 of the Rules so that it can become a member of the National Exchange Carrier Association ("NECA") and participate in NECA tariffs and pools. Waiver of Section 69.2(hh) will allow Allband to be classified as a "telephone company" and a "local exchange carrier" as those terms are used in Part 69. Pursuant to the express language of Section 69.2(hh), this will allow Allband to be an "incumbent local exchange carrier" as defined in Section 251(h) of the Communications Act, as amended. Waiver of Section 69.601 will allow Allband, as a "telephone company," to become a member of NECA and participate in NECA tariffs and pools.

Allband will seek support from federal universal service mechanisms at the appropriate times and via the appropriate procedures.

In addition to the foregoing waivers, Allband hereby requests waiver of any and all other relevant sections of Parts 54 and 36 of the Rules, to the extent necessary, in order to be treated as an "incumbent local exchange carrier" for the purpose of imposing access charges and receiving federal universal service support. Finally, Allband requests waiver of any Part 54 certification or data filing deadlines that would prevent it from beginning to receive high cost loop, local switching or interstate common line support on the date on which it would otherwise be entitled to receive such support. See *Order (M&L Enterprises, Inc. d/b/a Skyline Telephone Company)*, DA 05-84, released January 14, 2005.

Respectfully submitted,


Paul M. Hartman
General Manager
Allband Communications Cooperative

Tuesday, June 14, 2005 (3).max